

UNITED STATES DISTRICT COURT FOR THE NEW YORK-NORTHERN

UNITED STATES OF AMERICA
c/o Gary Valerino (Nyn7)
313 East Willow Street, Suite 201
Syracuse, NY 13203

Plaintiff

vs.

CASE NO: 5:12-CV-1410 (GLS/ATB)

Michael Shanahan
1845 North Rd.
Tully, NY 13159-9427

Defendant

COMPLAINT FOR MONEY OWED TO THE UNITED STATES

The United States of America, plaintiff, alleges that:

Jurisdiction

1. This Court has jurisdiction over the subject matter of this action pursuant to Article III, Section 2, U.S. Constitution, 28 U.S.C. § 1345, and 28 U.S.C §3004.

VENUE

The Defendant(s) is a resident of Onondaga County, New York within the jurisdiction of this Court and may be served with service of process at 1845 North Road, Tully, New York 13159-9427.

THE DEBT

2. The debt owed to the USA is as follows:

A.	Current Principal(after application of all prior Payments, credits and offsets)	\$365.63
B.	Current Capitalized Interest Balance And accrued interest	\$291.80
C.	Administrative Fee, costs, penalties	\$0
TOTAL OWED		<hr/> \$657.43

The promissory note, attached as Exhibit "A" shows the original amount owed. Prejudgment interest accrues at the rate of 5.000% per annum.

2.a The debt owed to the USA is as follows:

A.	Current Principal(after application of all prior Payments, credits and offsets)	\$1,086.06
B.	Current Capitalized Interest Balance And accrued interest	\$200.20
C.	Administrative Fee, costs, penalties	\$0
TOTAL OWED		<hr/> \$1,286.26

The promissory note, attached as Exhibit "A" shows the original amount owed. Prejudgment interest accrues at the rate of 8.170% per annum, plus Attorney's fees to the extent allowed by law; plus costs and post-judgment interest.

The Certificate of Indebtedness, attached as Exhibit "B", shows the total owed excluding attorney's fees and Court costs and related charges.

Failure to Pay

3. Demand has been made upon the defendant for payment of the indebtedness, and the defendant has neglected and refused to pay the same.

WHEREFORE, the United States of America prays for judgment:

A. For the sums set forth in paragraph 2 above, plus prejudgment interest through the date of judgment, all administrative costs, and service of process costs allowed by law, and post-judgment interest pursuant to 28 U.S.C. § 1961 with that interest on the judgment at the legal rate per annum until paid in full;

B. For attorneys' fees allowed by law or contract; and

C. For such other relief which the Court deems proper.

Respectfully submitted,



Gary Valerino (Nyn7), Bar No. 505771

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ATTORNEY FOR THE UNITED STATES OF AMERICA

September 6, 2012

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